

FILED 17 SEP 24 15:26 USDC-ORP

UNDER SEAL

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

No. 3:24-cr-

353-AN

v.

18 U.S.C. § 2

18 U.S.C. § 1589(a)

18 U.S.C. § 1589(b)

18 U.S.C. § 1594(b)

Forfeiture Allegation

**YOLANDITA MARIE ANDRE &
MARIE GERTRUDE JEAN VALMONT,**

Defendants.

UNDER SEAL

THE GRAND JURY CHARGES

Count 1

**(Conspiracy to Commit Forced Labor)
(18 U.S.C. §§ 1589(a) and 1594(b))**

Beginning on or about September 8, 2023, and continuing to on or about July 24, 2024, in the District of Oregon, defendants **YOLANDITA MARIE ANDRE** and **MARIE GERTRUDE JEAN VALMONT** conspired with each other to knowingly provide and obtain the services of Adult Victim 1 (AV1), Adult Victim 2 (AV2) and Minor Victim (MV) by means of force and threats of force, physical restraint and threats of physical restraint to AV1, AV2, and MV, serious harm and threats of serious harm to AV1, AV2, and MV, the abuse and threatened abuse of law and legal process, and by means of a scheme, plan, and pattern intended to cause AV1, AV2, and MV to believe that, if they did not perform such labor and services, they would suffer serious harm and physical restraint;

In violation of Title 18, United States Code, Sections 1589(a) and 1594(b).

Count 2
(Forced Labor)
(18 U.S.C. §§ 1589(a) and 2)

Beginning on or about September 8, 2023, and continuing to on or about July 24, 2024, in the District of Oregon, defendants **YOLANDITA MARIE ANDRE** and **MARIE GERTRUDE JEAN VALMONT**, aiding and abetting one another, did knowingly provide and obtain the services of Adult Victim 1 (AV1) by means of force and threats of force, physical restraint and threats of physical restraint, serious harm and threats of serious harm, the abuse and threatened abuse of law and legal process, and by means of a scheme, plan, and pattern intended to cause AV1 to believe that, if AV1 did not perform such labor and services, AV1 would suffer serious harm and physical restraint;

In violation of Title 18, United States Code, Sections 1589(a) and 2.

Count 3
(Forced Labor)
(18 U.S.C. §§ 1589(a) and 2)

Beginning on or about September 8, 2023, and continuing to on or about July 24, 2024, in the District of Oregon, defendants **YOLANDITA MARIE ANDRE** and **MARIE GERTRUDE JEAN VALMONT**, aiding and abetting one another, did knowingly provide and obtain the services of Adult Victim 2 (AV2) by means of force and threats of force, physical restraint and threats of physical restraint, serious harm and threats of serious harm, the abuse and threatened abuse of law and legal process, and by means of a scheme, plan, and pattern intended to cause AV2 to believe that, if AV2 did not perform such labor and services, AV2 would suffer serious harm and physical restraint;

In violation of Title 18, United States Code, Sections 1589(a) and 2.

Count 4
(Forced Labor)
(18 U.S.C. §§ 1589(a) and 2)

Beginning on or about September 8, 2023, and continuing to on or about July 24, 2024, in the District of Oregon, defendants **YOLANDITA MARIE ANDRE** and **MARIE GERTRUDE JEAN VALMONT**, aiding and abetting one another, did knowingly provide and obtain the services of Minor Victim 1 (MV1) by means of force and threats of force, physical restraint and threats of physical restraint, serious harm and threats of serious harm, the abuse and threatened abuse of law and legal process, and by means of a scheme, plan, and pattern intended to cause MV1 to believe that, if MV1 did not perform such labor and services, MV1 would suffer serious harm and physical restraint;

In violation of Title 18, United States Code, Sections 1589(a) and 2.

Count 5
(Benefitting from Forced Labor)
(18 U.S.C. § 1589(b))

Beginning on or about September 8, 2023, and continuing to on or about July 24, 2024, in the District of Oregon, defendants **YOLANDITA MARIE ANDRE** and **MARIE GERTRUDE JEAN VALMONT** did knowingly benefit by receiving things of value from participation in a venture that engaged in providing and obtaining labor and services by Adult Victim 1 (AV1) by means of force and threats of force, physical restraint and threats of physical restraint to AV1, serious harm and threats of serious harm to AV1, the abuse and threatened abuse of law and legal process, and by means of a scheme, plan, and pattern

intended to cause AV1 to believe that, if they did not perform such labor and services, that AV1 would suffer serious harm and physical restraint;

In violation of Title 18, United States Code, Section 1589(b).

Count 6
(Benefitting from Forced Labor)
(18 U.S.C. § 1589(b))

Beginning on or about September 8, 2023, and continuing to on or about July 24, 2024, in the District of Oregon, defendants **YOLANDITA MARIE ANDRE** and **MARIE GERTRUDE JEAN VALMONT** did knowingly benefit by receiving things of value from participation in a venture that engaged in providing and obtaining labor and services by Adult Victim 2 (AV2) by means of force and threats of force, physical restraint and threats of physical restraint, serious harm and threats of serious harm, the abuse and threatened abuse of law and legal process, and by means of a scheme, plan, and pattern intended to cause AV2 to believe that, if AV2 did not perform such labor and services, that AV2 would suffer serious harm and physical restraint,

In violation of Title 18, United States Code, Section 1589(b).

Count 7
(Benefitting from Forced Labor)
(18 U.S.C. § 1589(b))

Beginning on or about September 8, 2023, and continuing to on or about July 24, 2024, in the District of Oregon, defendants **YOLANDITA MARIE ANDRE** and **MARIE GERTRUDE JEAN VALMONT** did knowingly benefit by receiving things of value from participation in a venture that engaged in providing and obtaining labor and services by Minor Victim 1 (MV1) by means of force and threats of force, physical restraint and threats

of physical restraint, serious harm and threats of serious harm, the abuse and threatened abuse of law and legal process, and by means of a scheme, plan, and pattern intended to cause MV1 to believe that, if MV1 did not perform such labor and services, that MV1 would suffer serious harm and physical restraint,

In violation of Title 18, United States Code, Section 1589(b).

FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in Counts 1 through 7 of this Indictment, defendants **YOLANDITA MARIE ANDRE** and **MARIE GERTRUDE JEAN VALMONT** shall forfeit to the United States, pursuant to 18 U.S.C. § 1594(d)(1), defendants' interest in any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property, and pursuant to 18 U.S.C. § 1594(d)(2), any property, real or personal, constituting or derived from any proceeds that defendants obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

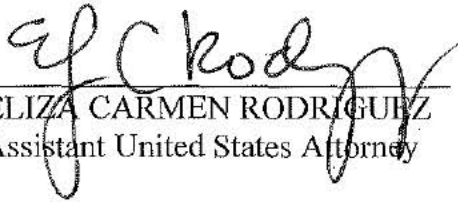
DATED: September 17, 2024.

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT
United States Attorney


ELIZA CARMEN RODRIGUEZ
Assistant United States Attorney